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Attorneys for Plaintiff
LAURI VALJAKKA

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

LAURI VALJAKKA,

Plaintiff,

v.

NETFLIX, INC.,

Defendant.

Case No. 4:22-SC-01490-JST

**DECLARATION OF WILLIAM P.
RAMEY, III IN OPPOSITION TO
DEFENDANT NETFLIX, INC.'S MOTION
TO EXCLUDE PORTIONS OF THE
OPINIONS AND TESTIMONY OF
ROBERT HELD**

Hearing Date: November 30, 2023
Judge: Hon. Jon S. Tigar

I, William P. Ramey, III, declare as follows:

1 1. I am over the age of 18, and I am Plaintiffs' counsel of record in the above-
2 captioned case. I would and could competently testify as set forth below in a court of law.

3 2. Attached as Exhibit A is a true and correct copy of portions of the Expert Report
4 of Tibor Kozek Ph.D, served July 7, 2023 (under seal).

5 3. Attached as Exhibit B is a true and correct copy of portions of Netflix's 2016
6 10K.

7 4. Attached as Exhibit C is a true and correct copy of a printout of NFX-VALJ-
8 00007111 (under seal).

9 5. Attached as Exhibit Dis a true and correct copy of a printout of NFX VALJ-
10 00006391 (under seal), which is referenced in the Expert Report of Robert Held (Exhibit J), in
11 paragraphs 161 and 200.

12 6. Attached as Exhibit F is a true and correct copy of portions of Netflix's 2018
13 10K.

14 7. Attached as Exhibit G is a true and correct copy of portions of Netflix's 2013
15 10K.

16 8. Attached as Exhibit H is a true and correct copy of portions of pages from the
17 transcript of the deposition of Helen Ponce, taken June 16, 2023 (under seal).

18 9. Attached as Exhibit I is a true and correct copy of a printout of NFX-VALJ-
19 00007111 (under seal).

20 10. Attached as Exhibit J is a true and correct copy of the Expert Report of Robert
21 Held (under seal).

22 11. Attached as Exhibit K is a true and correct copy of the Supplemental Expert
23 Report of Robert Held (under seal).

24 12. Attached as Exhibit L is a true and correct copy of a document filed by Netflix as
25 ECF 108-2 in this case.
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Executed October 6, 2023 at Houston, Texas.

William P. Ramey III